United States
Environmental Protection
Agency

Office of
Air, Noise and Radiation
Washington, DC 20460

EPA

OMSAPC
Advisory Circular

Subject: General Criteria for Making Car Line and Truck Line Determinations

I. Purpose

The purpose of this advisory circular (A/C) is to set forth the criteria that EPA will use to make car line and truck line determinations.

II. Background

A. The concept of "car line" has been incorporated in the EPA fuel economy program since the 1975 model year. In the past, car lines were used primarily to facilitate reporting of fuel economy performance, and EPA made car line determinations more or less subjectively by applying the general definition in 40 CFR 600.002-79 and 86.078-2. Beginning with the 1979 model year, however, car line determinations have played a more significant role in both the fuel economy and certification programs: vehicle road-load setting and equivalent test weight for durability-data, emission-data, and fuel economy data vehicle testing are now affected by car line determinations (40 CFR 86.129-79 and -80 and 86.024-79(g) and -80). In keeping with this increased influence, EPA has developed objective car line determination procedures for passenger automobiles (and analogous "truck line" determination procedures for light trucks) in an attempt to assure consistency for all manufacturers' product lines.

B. In a letter dated May 5, 1978, EPA provided the industry with a set of objective passenger automobile car line criteria. These criteria were used successfully in a pilot effort for the 1979 model year to determine passenger automobile car lines. These same criteria have been used for 1980 passenger automobile car line determinations.

C. On June 2, 1978, EPA requested comments from the industry on proposed truck line criteria for 1980. On October 31, 1978, EPA notified the industry of the final 1980 truck line criteria. Those criteria were used for truck line determinations for 1980, with the exception of a portion of one manufacturer's product line due to lead time considerations.

III. Applicability

This circular is applicable to all 1981 and later model year automobiles (as defined in 40 CFR 600.002-79).

IV. Definitions

The following definitions are for use in the context of this advisory circular:

A. Model Name: The name the manufacturer or importer assigns in his sales literature to vehicles offered in his product line. For example, Aspen Super Coupe, Aspen R/T Coupe, Aspen Four-Door Sedan, Electra Limited Sedan, and Electra Park Avenue Coupe are model names which can be found in 1978 model year sales brochures.

B. Common Model Name: Within a group of model names, a "common model name" is a word or phrase which is common to more than one model name and is routinely used in sales literature to identify a particular group of model names; for example, LeSabre Coupe, LeSabre Sedan, LeSabre Sport Coupe, LeSabre Custom Coupe, and LeSabre Custom Sedan. The word "LeSabre" would be considered a "common model name" because it is associated with all the model names found in the LaSabre sales literature. Conversely, the words Coupe or Custom could not be considered common model names (even though they appear in more than one model name) because they are not used in sales literature to identify a group of model names: i.e., a Custom or Coupe sales brochure does not exist.

C. Manufacturing Division: The division nameplate under which the vehicle is produced or marketed.

D. Base Vehicle: As used in this A/C, a base vehicle is a vehicle without options, either deletions or additions, to a "standard" vehicle.

E. 2-Wheel Drive: Vehicles with only 2-wheel drive (2WD) capability.

F. 4-Wheel Drive: Vehicles with 4-wheel drive (4WD) capability (either manually or automatically selected, or full-time 4-wheel drive).

G. Heavy-Load Carrier: A base vehicle which has as standard equipment a full-floating drive axle and wheels of 16.5 inch or greater diameter.

H. Light-Load Carrier: A base vehicle which is not a heavy load carrier.

I. Cargo-Carrier Van: A base van equipped for cargo carrying; for example, a van which has no seating other than the driver's seat and passenger seat adjacent to the right side front door and there are no windows except for the front and rear doors and the windshield.

J. Passenger-Carrier Van: A base van equipped for passenger carrying; for example, a van which has additional windows and seating positions other than those described above for cargo-carrier vans.

K. Top Style: A base vehicle which has as standard equipment:

1. A fixed top, not removable (e.g., Jeep Cherokee, GM Suburban), or
2. A removable top, or
3. No top over driver or passenger areas.

L. Truck-Line Name: The name utilized to describe the truck line. This should include the marketing name(s) (e.g., F100/F250 pickup 4WD). Two-wheel drive trucks will use 2WD as part of the truck line name. Four-wheel drive trucks will use 4WD as part of the truck line name.

M. Classes: The general classes of vans, pickups, and special purpose vehicles are as defined in 40 CFR 600.002-79 and 600.315-78.

N. Passenger Car Derivatives: A vehicle, which because of its construction characteristics as related to a passenger car, is determined by EPA to be appropriately certified to light-duty vehicle emission standards.

V. Establishment of Vehicle Class

Prior to establishing car or truck lines, the vehicle must be classified as a passenger automobile or light truck. The definitions established by NHTSA in 49 CFR Part 523 will be used.

VI. Car-Line Determinations

For all passenger automobiles the following procedure will be used to determine car lines.

A. For a manufacturer's passenger automobiles, wheelbase-width groupings are established separately for sedans and station wagons, where the wheelbase measurement is L-101 and the width measurement is W-103 as defined in SAEJ 1100a.

B.1. Vehicles within each wheelbase-width grouping will be considered to be in a different car line unless a "common model name" appears in more than one grouping. If a common model name does appear in more than one grouping but the two-door, four-door and hatchback versions are each unique to a particular grouping, then all vehicles with the "common model name" shall be considered to be within the same car line.

2. Vehicles within each wheelbase-width grouping which have more than one "common model name" will be considered in the same car line and each name will be used to describe the car line name. (Ref. Attachment I, page 4.)

C. Attachment I provides a step-by-step example of how the procedure works in an actual case based on 1978 information.

D. Attachment II provides a suggested format for manufacturers to use in submitting model names, wheelbase-widths, and two-door, four-door, and hatchback availability.

E. Car lines for passenger automobiles classed as special purpose vehicles under 40 CFR 600.315-79(a)(3) will be determined according to paragraph VII.D.

F. Petition to alter car line determinations.

1. Some manufacturers may believe that certain portions of the car line criteria over-segregate their product line in certain areas. Since no two manufacturers' product lines are identical, the application of broad objective criteria to the entire industry may create a burden for some manufacturers. Conversely, some manufacturers may believe that the car line criteria are too broad to establish car lines consistent with their marketing approach. Consequently, EPA will consider (on a case-by-case basis) requests from manufacturers to either combine or subdivide car lines that are established by the criteria in paragraphs VI.A through E.

2. A manufacturer who wishes to combine car lines should note where he has combined car lines and demonstrate that his proposed car lines:

a. Do not significantly increase model type fuel economy variability,

b. Do not deprive the buying public of meaningful definitions of vehicles with distinct fuel economies, and

c. Do not degrade the usefulness of car line determinations as a tool for consumers to use in comparison of fuel economies of comparable vehicles.

3. A manufacturer who wishes to subdivide car lines further than indicated in Attachment I, would indicate where the car lines have been subdivided, indicate what criteria for subdivision were used, and demonstrate that his proposed car lines:

a. Decrease significantly the model type fuel economy variability,

b. Provide the buying public with more meaningful definitions of vehicles with distinct fuel economies, and

c. Improve the usefulness of car line determinations as a tool for consumers to use in comparison of fuel economies on comparable vehicles.

4. In either case (paragraph VI.F.2 or VI.F.3), EPA must be convinced that there is a valid reason to introduce a complexity into car line determinations that is inconsistent with industry practice.

VII. Truck-Line Determinations

For all light trucks the following procedures will be used to determine truck lines:

A. Trucks (and passenger automobiles, as appropriate) are first divided into the subcategories of pickups, vans, and special purpose vehicles according to the definitions in 40 CFR Part 600.002-79 and 600.315-78.

B. The following items (and combinations thereof) determine distinct truck lines for pickup trucks:

1. Manufacturing Division
2. 2-Wheel Drive
3. 4-Wheel Drive
4. Heavy-Load Carrier
5. Light-Load Carrier
6. Passenger Car Derivative

C. The following items (and combinations thereof) determine distinct truck lines for vans:

1. Manufacturing Division
2. 2-Wheel Drive
3. 4-Wheel Drive
4. Heavy-Load Carrier
5. Light-Load Carrier
6. Cargo-Carrier
7. Passenger-Carrier

D. The following items (and combinations thereof, except item 7) determine distinct truck lines (or car lines as appropriate) for special purpose vehicles:

1. Manufacturing Division
2. 2-Wheel Drive
3. 4-Wheel Drive
4. Heavy-Load Carrier
5. Light-Load Carrier
6. Top Style
7. Passenger Car Derivative
8. Cab-Chassis (pickup, van, or light-duty vehicle derivative only). Cab chassis vehicles will only be distinguished based on derivation (i.e., pickup derivative, van derivative, or light-duty vehicle derivative).

E. Petition to alter truck line determinations.

1. Some manufacturers may believe that certain portions of the truck line criteria over-segregate their product line in certain areas. Since no two manufacturers' product lines are identical, the application of broad objective criteria to the entire industry may create a burden for some manufacturers. Conversely, some manufacturers may believe that the truck line criteria are too broad to establish truck lines consistent with their marketing approach. Consequently, EPA will consider (on a case-by-case basis) requests from manufacturers to either combine or subdivide truck lines that are established by the criteria in paragraphs VII.A through D.

2. A manufacturer who wishes to combine truck lines should note where he has combined truck lines and demonstrate that his proposed truck lines:

a. Do not significantly increase model type fuel economy variability,

b. Do not deprive the buying public of meaningful definitions of vehicles with distinct fuel economies, and

c. Do not degrade the usefulness of truck line determinations as a tool for consumers to use in comparison of fuel economies of comparable vehicles.

3. A manufacturer who wishes to subdivide truck lines further than indicated in Attachment I, would indicate where the truck lines have been subdivided, indicate what criteria for subdivision were used, and demonstrate that his proposed truck lines:

a. Decrease significantly the model type fuel economy variability,

b. Provide the buying public with more meaningful definitions of vehicles with distinct fuel economies, and

c. Improve the usefulness of truck line determinations as a tool for consumers to use in comparison of fuel economies on comparable vehicles.

4. In either case (paragraph VII.E.2 or VII.E.3), EPA must be convinced that there is a valid reason to introduce a complexity into truck line determinations that is inconsistent with industry practice.

VIII. Submission of Supplementary Data

A. When requesting car or truck line determinations, manufacturers are requested to submit photographs or drawings of any new car or truck line in addition to submitting the data required in paragraphs VI and VII.

B. When sales literature is printed, manufacturers are requested to submit copies of each brochure to EPA (as originally requested in OMSAPC Advisory Circular No. 67, Paragraph J).

IX. Timing of Requests for Car and Truck Line Determinations

A. Since car lines and truck lines apply to both Part 86 (Certification) and Part 600 (Fuel Economy), manufacturers are encouraged to submit requests for determination of car lines and truck lines to EPA at least one month prior to the time the determination will be required for use in developing the application for certification.

B. Requests for car line and truck line determinations must be made separately for each model year.

C. Requests for determination of car and truck lines, the necessary documentation specified under Paragraphs VI and VII, and appropriate sales literature should be sent to:

Fuel Economy Group
Certification Division
Environmental Protection Agency
2565 Plymouth Road
Ann Arbor, Michigan 48105

X. Car Line and Truck Line Codes

A. In response to a request for determination, EPA will advise each manufacturer in writing of the car lines and truck lines for each model year.

B. EPA will also provide the manufacturer with a car or truck line code to be used in identification of the vehicle in all certification and fuel economy data submittals.

Mobile Source Air Pollution Control

Attachments

ATTACHMENT I

PROPOSED PASSENGER AUTOMOBILE CAR LINE DETERMINATION PROCEDURE

INCLUDING SEQUENCED EXAMPLE

Step 1. For a manufacturer's or division's sedan and station wagon product offerings, construct lists (separately for the wagons and sedans) of all model name/wheelbase/width combinations (see below), grouping together combinations which have the same wheelbase and width dimensions. For each combination, indicate the availability of two-door, four-door, and hatchback vehicles.

	Dodge Sedan Passenger Automobiles		
Model Names	2 DR/4 DR/HB	Wheelbase[1]	Width[2]
Omni	4 Dr. HB	99.2	66.2
Challenger	2 Dr.	99.0	65.9
Colt 2-door Coupe M/M	2 Dr.	92.1	60.4
Colt 4-door Coupe M/M	4 Dr.	92.1	60.4
Aspen 2-door Sport Coupe	2 Dr.	108.7	73.3
Aspen R/T Sport Pak	2 Dr.	108.7	73.3
Aspen Special Edition Coupe	2 Dr.	108.7	73.3
Aspen Super Coupe	2 Dr.	108.7	73.3
Aspen R/T Coupe	2 Dr.	108.7	73.3
Aspen 4-door Sedan	4 Dr.	112.7	73.3
Diplomat Medallion	4 Dr.	112.7	73.3
Diplomat	4 Dr.	112.7	73.3
Diplomat	2 Dr.	112.7	73.5
Diplomat Medallion	2 Dr.	112.7	73.5
Monaco	4 Dr.	117.4	77.7

[1]Wheelbase as defined in SAE J1100a-L101
[2]Width as defined in SAE J1100a-W103

Dodge Sedan Passenger Automobiles

Model Names	2 DR/4 DR/HB	Wheelbase	Width
Monaco Brougham	4 Dr.	117.4	77.7
Monaco	2 Dr.	114.9	77.7
Monaco Brougham	2 Dr.	114.9	77.7
Charger SE	2 Dr.	114.9	77.1
Magnum XE	2 Dr.	114.9	77.1
Magnum GT	2 Dr.	114.9	77.1

Dodge Station Wagon Passenger Automobiles

Model Names	2 DR/4 DR/HB	Wheelbase	Width
Aspen Wagon	4 Dr.	112.7	73.3
Aspen Special Edition Wagon	4 Dr.	112.7	73.3
Diplomat 4-Door Wagon	4 Dr.	112.7	73.3
Colt 4-Door Wagon	4 Dr.	99.0	65.2
Monaco 4-Door Wagon	4 Dr.	177.5	78.8

Step 2. Identify the "common model names."

Dodge Sedan Passenger Automobiles

Model Names	2 DR/4 DR/HB	Wheelbase	Width
Omni	4 Dr. HB	99.2	66.2
Challenger	2 Dr.	99.0	65.9
Colt Custom Coupe M/M	2 Dr.	92.1	60.4
Colt 4-door Coupe M/M	4 Dr.	92.1	60.4
Aspen 2-door Sport Coupe	2 Dr.	108.7	73.3
Aspen R/T Sport Pak	2 Dr.	108.7	73.3
Aspen Special Edition Coupe	2 Dr.	108.7	73.3
Aspen Super Coupe	2 Dr.	108.7	73.3

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ATTACHMENT II - PASSENGER AUTOMOBILE CAR LINE WORK SHEET

Manufacturer or Division: _____

Model Year: _____

Model Name	2 DR/4 DR/HB	Wheelbase (SAEJ1100a-L101)	Width (SAEJ1100a-W103)

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